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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

November 29, 2012

Response to the Registry of Interpreter for the Deaf (RID) comments (November 14, 2012) regarding CG Docket Nos. Nos. 03-123 and 10-51 "Structure and Practices of Video Relay Service (VRS) Program" and "Proposed VRS Compensation Rates" & the FCC Public Notice (DA 12-1644)¹.

Dear Secretary Dortch,

Mano a Mano is a non-profit [501(c)(3)] organization of trilingual (Spanish, English and American Sign Language) interpreters in the United States who work in communities and settings where Spanish is prevalent. Many trilingual signed language interpreters work as Communication Assistants (CAs) in VRS calls.

We have commented in the past on the topic of minimum standards for interpreters who work calls that involve the use of Spanish², and we wish to reaffirm our earlier comments while also supporting those of the Registry of Interpreters for the Deaf (RID).

We fully support RID's recommendation to refer to CAs as *interpreters*, since CAs are more than simply fluent language users of ASL. These professionals must be trained in the techniques and practiced in the skills required for reaching functional equivalence between languages and cultures, and we feel that the term *communication assistant* does not adequately consider their formal training and their earned professional status. Not only is this true for bilingual interpreters, but it is even more evident with trilingual interpreters who must achieve professional-level competency in three languages and multiple cultures (e.g., Mexican, Puerto Rican, and Dominican cultures and dialects of Spanish).

We also believe that interpreters who work VRS calls that include Spanish (e.g., English-Spanish-ASL or Spanish-ASL) should be given a temporary waiver from a national certification requirement until we can evaluate our current assessment resources to determine if they would be appropriate metrics for national certification. As mentioned in our last response, there currently exists a trilingual (Spanish-English-ASL) certification exam (the Texas BEI Trilingual Certification), although it has not been recognized nationally for use by interpreters throughout the US. Mano a Mano recently initiated an internal process to evaluate its efficacy for measuring trilingual or bilingual (Spanish-ASL) skills on the national level.

We also continue to believe that Spanish-English-ASL interpreters and Spanish-ASL interpreters who work VRS calls should be given mentorship opportunities and encouraged to partner/team with linguistically qualified Certified Deaf Interpreters (CDIs) and other Deaf interpreters with appropriate skills. Teaming improves the effectiveness of interpretations, especially in calls where specialized skills in varieties of visual-gestural communication are needed; teaming would support functional equivalence throughout the calls.


Mano a Mano is committed to working with the FCC and interpreter organizations such as the Registry of Interpreters for the Deaf to explore possible solutions to this issue. To that end, we have recently been collaborating with RID to address the question of minimum standards for trilingual (Spanish-English-ASL) and bilingual (Spanish-ASL) VRS interpreters. I feel confident that we will reach a solution that works for these interpreters while maintaining strong professional minimum standards for all VRS interpreters.

¹ RID response to FCC Public Notice (DA 12-1644)

² Mano a Mano response to FCC 11-184, filed August 28, 2012.

Feel free to contact me if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, reading "David Quinto-Pozos". The signature is written in a cursive style with a large, stylized "Q" and "P".

David Quinto-Pozos, PhD, RID CI & CT, NIC Master
President, Mano a Mano
Assistant Professor of Linguistics
University of Texas at Austin